

[If you need additional space for ANY section, please attach additional sheets.]

FILED

JAN 26 2022

1:22-cv-00462

Judge John J. Tharp, Jr.
Magistrate Judge Young B. Kim
RANDOM

LYNN HICKS,

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Plaintiff

v.

1. EDMOND KNOX et, al.

2. TIFFANY H. HUGES OWNER OF
THE LAW OFFICE OF TIFFANY M.
HUGES, P.C. et, al.

3. MARIA M. BARLOW d/b/a THE LAW
OFFICE OF MARIA M. BARLOW LLC
ATTORNEY AND COUNSELOR AT LAW et, al.

Defendants

United States District court
Northern District of Illinois

see exhibit "C" & "D"
attached in support of
complaint against Tiffany Hughes.

COMPLAINT

Plaintiff Lynn Hicks, ("Lynn"), (collectively, "Plaintiff"), by and through plaintiff being non represented by an attorney, pro se litigant, for her complaint against defendants, EDMOND KNOX, TIFFANY H. HUGES, , AND MARIA M. BARLOW, d/b/a THE LAW OFFICE OF MARIA M. BARLOW LLC ATTORNEY AND ("COUNSELOR AT LAW"), state as follows:

NATURE OF THE ACTION

1. This is a federal- question under the federal issue evoked, and plaintiff complaint sought be a well-pleaded one, plaintiff, initial complaint contains, the references to the federal question and the federal issue evoked. And common law claims under Illinois law. Plaintiff, assert claims against defendant Edmond Knox, in Illinois, the plaintiff asserting a common law fraud claim AKA legal fraud, and the plaintiff Lynn Hicks, can prove that: The defendant made more than one and multiple false statements of material, including material misrepresentation. The defendant made the statement with knowledge that it was false.
2. Defendant Edmond Knox, custodian for CPS, has used his legal counsels, TIFFANY H. HUGES OWNER OF THE LAW OFFICE OF TIFFANY M. HUGES, P.C. et, al., and MARIA M. BARLOW d/b/a THE LAW OFFICE OF MARIA M. BARLOW LLC to intentionally, and maliciously, interfere with Plaintiff rights as being, single and unmarried mother with 2 teen age adult children that has graduated from, high school, including 1 teenage in high school, and 2 minor children and one of the minor children being the reason why defendant Edmond Knox, is has an open DCFS case against him, for fumbling on his blood 10-year-old minor daughter, conceived with plaintiff Lynn Hicks, and defendant Edmond Knox, using false statements of material, including material misrepresentation, of being married to plaintiff and under a fraudulent Case Docket No. 2015D79551 IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS COUNTY DEPARTMENT, DOMESTIC RELATIONS DIVISION.

Pages 1 of 3

Lynn Hicks
Signature

01-26-2022
Date:

3. Defendant, use false statements of material, in and makes available to TIFFANY H. HUGES OWNER OF THE LAW OFFICE OF TIFFANY M. HUGES, P.C. et, al. who makes available to MARIA M. BARLOW d/b/a THE LAW OFFICE OF MARIA M. BARLOW LLC plaintiff and defendant, are not married, and has never been married, and never will be married. Defendant has created an fraudulent marriage to plaintiff Pursuant to the Illinois Parentage Act of 2015, 750 ILCS 45/1 45/1 et seq. and Section 501 and 505 of the Illinois Marriage and Dissolution of Marriage Act, 750 ILCS 5/501 and 505, which basis is based on fraud on the court occurs when the judicial machinery itself has been tainted, such as when an attorney's, TIFFANY H. HUGES OWNER OF THE LAW OFFICE OF TIFFANY M. HUGES, P.C. et, al., and MARIA M. BARLOW d/b/a THE LAW OFFICE OF MARIA M. BARLOW LLC ATTORNEY AND COUNSELOR AT LAW, and Both named parties are officers of the court. See fraudulent document
4. With intent to interfere with and cause interference, defendant continue use the fraudulent marriage to plaintiff that otherwise interfere with plaintiff full parental rights to her two minor children.
5. Defendant should have known, common law marriage, does not exist in Illinois, and defendant is involved in the perpetration of a fraud and makes material misrepresentations to the court causing defendant Edmond Knox, to be responsible, making false statements that defendant and plaintiff are legally married and the true simple fact is that defendant and plaintiff, are not married.

Defendant Edmond Knox, with intent to interfere with and cause interference of plaintiff and to continue use the fraudulent marriage to plaintiff that otherwise interfere with plaintiff full parental rights to her two minor children.

6. Defendant Edmond Knox, continue to use his gun collection that consists of multiple, plenty and many guns used to make threats to anyone who try and help plaintiff and even plaintiff if plaintiff report defendant illegal gun collection and fraudulent marriage to her, defendant has even bought his gun to the kids, school and threaten to shoot plaintiff friend.
7. Defendant Edmond Knox, has intentionally since the physical year of 2015 maliciously interfered with plaintiff single life and relationships, and defendant refuse to understand plaintiff no longer wanting to be with him, defendant Edmond Knox, since the physical year of 2015 has used misrepresentation, falsified in- formation and fraud, to circuit court officials that he is legally married to plaintiff Lynn Hicks, and plaintiff is not married to defendant Edmond Knox and never have been, and defendant using a fraudulent marriage to control the custody of plaintiff two minor children.

THE PARTIES

8. Plaintiff Lynn Hicks, is a Custodian for CPS, with her principal place of employment at 6650 S. Ellis Ave. in Chicago, Illinois.
9. Defendant Edmond Knox, is a Custodian for CPS, with his principal place of employment at 2110 W. Greenleaf Ave. in Chicago, Illinois.
10. Defendant, Tiffany H. Hugues, is the Owner of the Law Office of Tiffany M. Hugues, P.C. et, al., with her principal place of business at 22 W. Washington St., Suite 1500 in Chicago, Illinois.
11. Defendant Maria M. Barlow, an individual, in the Law Offices of Maria Barlow LLC-Attorney and Counselor at Law with her principal place of business at 1718 East 87th Street Chicago, Illinois

JURISDICTION AND VENUE

12. This is a federal question and the federal issue evoked, and plaintiff complaint sought be a well-pleaded, plaintiff, initial complaint contains, the references to the federal question and the federal issue evoked, and the court also have Personal Jurisdiction.
13. Plaintiff, federal question, and issue, does not arise in an anticipated defense; and is presented from the initial complaint.

Ableman v. Booth, 21 Howard 506 (1859)

"No judicial process, whatever form it may assume, can have any lawful authority outside of the limits of the jurisdiction of the court or judge by whom it is issued; and an attempt to enforce it beyond these boundaries is nothing less than lawless violence." See Exhibits "A" "B" and "C" Exhibit "A" pages 1 of 2 in support of in support of Exhibits "B" and "C"

WHEREFORE, Plaintiff Lynn Hicks, prays that the Court enter judgment in her favor and against Defendants, Edmond Knox, TIFFANY H. HUGES OWNER OF THE LAW OFFICE OF TIFFANY M. HUGES, P.C. et, al., and MARIA M. BARLOW d/b/a THE LAW OFFICE OF MARIA BARLOW LLC ATTORNEY AND COUNSELOR AT LAW and award Lynn Hicks, the following relief: **Punitive Damages**

Plaintiff, seek to be granted \$100,000.00 punitive damages, and plaintiff pray with prayer upon the court to be awarded punitive damages and grant such other or further relief as the Court deems just and equitable, due to defendant's actions and especially the defendants, reckless and malicious conduct.

SEE Exhibit "A" & "B" Attached to Compl
See Exhibit "B" PETITION TO SET TEMPORARY AND PERMANENT
CHILD SUPPORT AND FOR OTHER RELIEF next page 1 of 1

AFFIDAVIT

I, **Lynn Hicks**, swear to the facts that form the basis of my child custody modification request, and petitioner, **Lynn Knox**, request for trial — if a settlement isn't reached, to be able to present evidence and call witnesses at a trial, with prayer upon the court that judge will enter an order modifying the existing parenting arrangement, due to the following reasons below:

Petitioner, **Lynn Hicks**, have grounds to request a change, and file motion to modify custody order, the current custody order was written and entered on Oct 28, 2016 → OCT 28, 2016 L.H

EXHIBIT "A"

(750 ILCS 5/501) (from Ch. 40, par. 501)

Sec. 501. Temporary relief. In all proceedings under this Act, temporary relief shall be as follows:

(a) Either party may petition or move for:

(1) temporary maintenance or temporary support of a child of the marriage entitled to support, accompanied by an affidavit as to the factual basis for the relief requested one form of financial affidavit, as determined by the Supreme Court, shall be used statewide the financial affidavit shall be supported by documentary evidence including, but not limited to, income tax returns, pay stubs, and banking statements.

EXHIBIT "B"

(750 ILCS 5/505) (from Ch. 40, par. 505)

Sec. 505. Child support; contempt; penalties.

In a proceeding for dissolution of marriage, legal separation, declaration of invalidity of marriage, or dissolution of a civil union, a proceeding for child support following a legal separation or dissolution of the marriage or civil union by a court that lacked personal jurisdiction over the absent spouse, a proceeding for modification of a previous order for child support under Section 510 of this Act, or any proceeding authorized under Section 501 or 601 of this Act, the court may order either or both parents owing a duty of support to a child of the marriage or civil union to pay an amount reasonable and necessary for support.

Exhibit "A" and Exhibit "B" in support of motion and affidavit, due to reason petitioner and respondent, was never married.

NOTARY:

State of Illinois

County of Cook

Subscribed and sworn before me on this 10th day of January in the year 2022 by

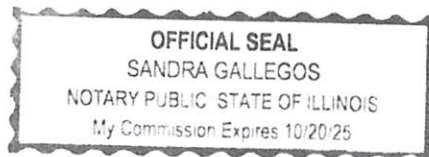
Affidavit in support custody/order modification
(Name of Document)

Lynn Hicks
(Signer)

Notary Public

Sandra Gallegos
Name:

1-10-2022



X Lynn Hicks

Exhibit "B" 2 of 2

Atty. No. 49197

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, DOMESTIC RELATIONS DIVISION

IN RE THE PARENTAGE OF)
LYNN HICKS,)
)
Petitioner,) No. 15 D 79551
and)
EDMOND KNOX,)
)
Respondent.)

**PETITION TO SET TEMPORARY AND PERMANENT
CHILD SUPPORT AND FOR OTHER RELIEF**

NOW COMES the Respondent, EDMOND KNOX ("EDMOND"), by and through his attorneys The Law Offices of Maria M. Barlow LLC, and for this Petition to Set Temporary and Permanent Child Support and For Other Relief filed against the Petitioner, LYNN HICKS ("LYNN"), states as follows:

1. This Petition is brought pursuant to the *Illinois Parentage Act of 2015*, 750 ILCS 45/1 *et seq.* and Sections 501 and 505 of the *Illinois Marriage and Dissolution of Marriage Act*, 750 ILCS 5/501 and 505.
2. The parties are the parents of two (2) minor children, Jacques Knox, having been born on June 23, 2006 and Jocelyn Knox, having been born on November 24, 2011.
(hereinafter referred to as ("minor children")).
3. On October 18, 2016, this Court entered an Order granting EDMOND the majority of parenting time with the minor children.

Exhibit "C"

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February 22, 2018

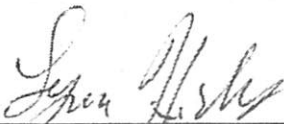
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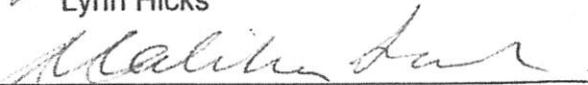
Three Hundred Dollars

for Payment towards balance, Law Office of Tiffany M. Hughes

Received by Maliha Siddiqui



Lynn Hicks



Maliha Siddiqui

Exhibit "D"

TIFFANY HUGHES

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March 1, 2018

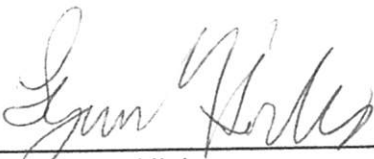
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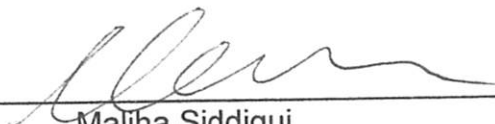
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Lynn Hicks



Maliha Siddiqui

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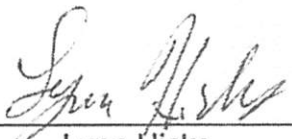
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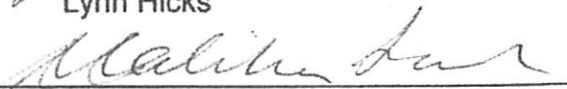
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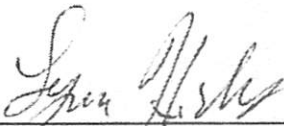
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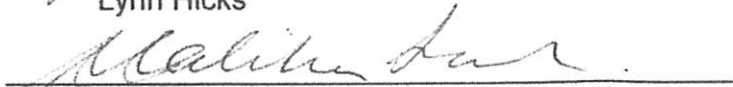
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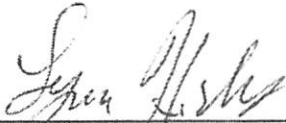
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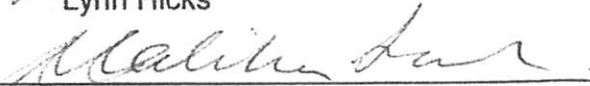
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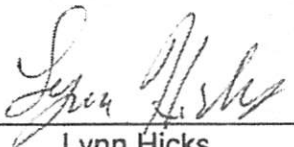
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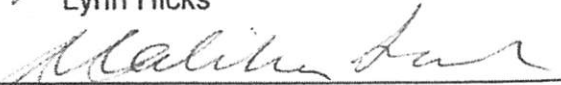
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Received by Maliha Siddiqui



Lynn Hicks



Maliha Siddiqui

Save this Copy
for your records.



29335229

CASHIER'S CHECK - Customer Receipt

February 24, 2018

Pay to the

Order of: TIFFANY HUGHS***

\$*****2,000.00

Amount: TWO THOUSAND 00/100 US DOLLARS

Memo: ATTORNEY FEES

Purchased by:

Transaction #: 843677554

Cost Center: 2511

Method of Purchase: Cash/Check

NON-NEGOTIABLE

The purchase of a Surety Bond may be required before any Cashier's Check on this bank will be replaced or refunded in the event it is lost, misplaced, or stolen.

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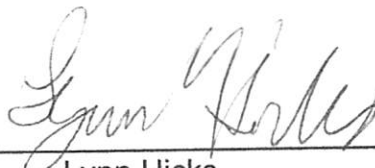
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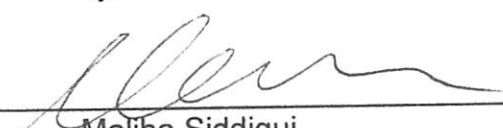
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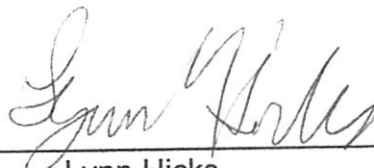
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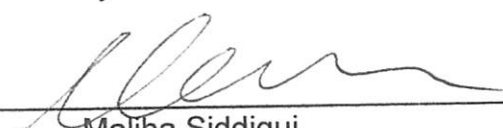
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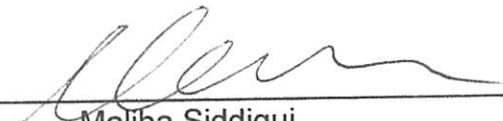
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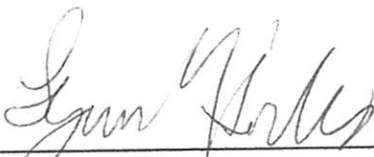
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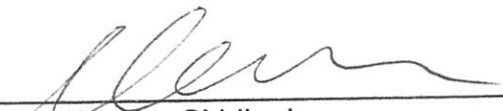
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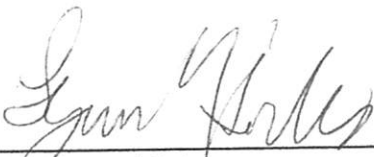
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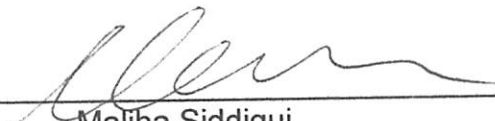
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Exhibit "B"

Atty. No. 49197

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, DOMESTIC RELATIONS DIVISION**

IN RE THE PARENTAGE OF

LYNN HICKS,

and

EDMOND KNOX,

Petitioner,

No. 15 D 79551

Respondent.

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CHILD SUPPORT AND FOR OTHER RELIEF**

NOW COMES the Respondent, EDMOND KNOX ("EDMOND"), by and through his attorneys The Law Offices of Maria M. Barlow LLC, and for this Petition to Set Temporary and Permanent Child Support and For Other Relief filed against the Petitioner, LYNN HICKS ("LYNN"), states as follows:

1. This Petition is brought pursuant to the *Illinois Parentage Act of 2015*, 750 ILCS 45/1 *et seq.* and Sections 501 and 505 of the *Illinois Marriage and Dissolution of Marriage Act*, 750 ILCS 5/501 and 505.

2. The parties are the parents of two (2) minor children, Jacques Knox, having been born on June 23, 2006 and Jocelyn Knox, having been born on November 24, 2011. (hereinafter referred to as ("minor children").

3. On October 18, 2016, this Court entered an Order granting EDMOND the majority of parenting time with the minor children.

Exhibit "B"

Atty. No. 49197

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, DOMESTIC RELATIONS DIVISION**

IN RE THE PARENTAGE OF

LYNN HICKS,

and

EDMOND KNOX,

Petitioner,

No. 15 D 79551

Respondent.

**PETITION TO SET TEMPORARY AND PERMANENT
CHILD SUPPORT AND FOR OTHER RELIEF**

NOW COMES the Respondent, EDMOND KNOX ("EDMOND"), by and through his attorneys The Law Offices of Maria M. Barlow LLC, and for this Petition to Set Temporary and Permanent Child Support and For Other Relief filed against the Petitioner, LYNN HICKS ("LYNN"), states as follows:

1. This Petition is brought pursuant to the *Illinois Parentage Act of 2015*, 750 ILCS 45/1 *et seq.* and Sections 501 and 505 of the *Illinois Marriage and Dissolution of Marriage Act*, 750 ILCS 5/501 and 505.

2. The parties are the parents of two (2) minor children, Jacques Knox, having been born on June 23, 2006 and Jocelyn Knox, having been born on November 24, 2011. (hereinafter referred to as ("minor children").

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Petitioner,

No. 15 D 79551

Respondent.

**PETITION TO SET TEMPORARY AND PERMANENT
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NOW COMES the Respondent, EDMOND KNOX ("EDMOND"), by and through his attorneys The Law Offices of Maria M. Barlow LLC, and for this Petition to Set Temporary and Permanent Child Support and For Other Relief filed against the Petitioner, LYNN HICKS ("LYNN"), states as follows:

1. This Petition is brought pursuant to the *Illinois Parentage Act of 2015*, 750 ILCS 45/1 *et seq.* and Sections 501 and 505 of the *Illinois Marriage and Dissolution of Marriage Act*, 750 ILCS 5/501 and 505.

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NOW COMES the Respondent, EDMOND KNOX ("EDMOND"), by and through his attorneys The Law Offices of Maria M. Barlow LLC, and for this Petition to Set Temporary and Permanent Child Support and For Other Relief filed against the Petitioner, LYNN HICKS ("LYNN"), states as follows:

1. This Petition is brought pursuant to the *Illinois Parentage Act of 2015*, 750 ILCS 45/1 *et seq.* and Sections 501 and 505 of the *Illinois Marriage and Dissolution of Marriage Act*, 750 ILCS 5/501 and 505.

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NOW COMES the Respondent, EDMOND KNOX ("EDMOND"), by and through his attorneys The Law Offices of Maria M. Barlow LLC, and for this Petition to Set Temporary and Permanent Child Support and For Other Relief filed against the Petitioner, LYNN HICKS ("LYNN"), states as follows:

1. This Petition is brought pursuant to the *Illinois Parentage Act of 2015*, 750 ILCS 45/1 *et seq.* and Sections 501 and 505 of the *Illinois Marriage and Dissolution of Marriage Act*, 750 ILCS 5/501 and 505.
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SEE Exhibit "A" & "B" Attached to Complaint
 See Exhibit "B" PETITION TO SET TEMPORARY AND PERMANENT
 CHILD SUPPORT AND FOR OTHER RELIEF next page 1st.

AFFIDAVIT

I, **Lynn Hicks**, swear to the facts that form the basis of my child custody modification request, and petitioner, Lynn Knox, request for trial — if a settlement isn't reached, to be able to present evidence and call witnesses at a trial, with prayer upon the court that judge will enter an order modifying the existing parenting arrangement, due to the following reasons below:

Petitioner, Lynn Hicks, have grounds to request a change, and file motion to modify custody order, the current custody order was written and entered on Oct 28, 2016 → OCT 28, 2016 L.H.

EXHIBIT "A"

(750 ILCS 5/501) (from Ch. 40, par. 501)

Sec. 501. Temporary relief. In all proceedings under this Act, temporary relief shall be as follows:

(a) Either party may petition or move for:

(1) temporary maintenance or temporary support of a child of the marriage entitled to support, accompanied by an affidavit as to the factual basis for the relief requested one form of financial affidavit, as determined by the Supreme Court, shall be used statewide the financial affidavit shall be supported by documentary evidence including, but not limited to, income tax returns, pay stubs, and banking statements.

EXHIBIT "B"

(750 ILCS 5/505) (from Ch. 40, par. 505)

Sec. 505. Child support; contempt; penalties.

In a proceeding for dissolution of marriage, legal separation, declaration of invalidity of marriage, or dissolution of a civil union, a proceeding for child support following a legal separation or dissolution of the marriage or civil union by a court that lacked personal jurisdiction over the absent spouse, a proceeding for modification of a previous order for child support under Section 510 of this Act, or any proceeding authorized under Section 501 or 601 of this Act, the court may order either or both parents owing a duty of support to a child of the marriage or civil union to pay an amount reasonable and necessary for support.

Exhibit "A" and Exhibit "B" in support of motion and affidavit, due to reason petitioner and respondent, was never married.

NOTARY:

State of Illinois

X Lynn Hicks

County of Cook

Subscribed and sworn before me on this 10th day of January in the year 2022 by

Affidavit in support custody/order modification
 (Name of Document)

Lynn Hicks
 (Signer)

Notary Public

Sandra Gallegos
 Name:

1-10-2022



SEE Exhibit "A" & "B" Attached to Complaint
 See Exhibit "B" PETITION TO SET TEMPORARY AND PERMANENT
 CHILD SUPPORT AND FOR OTHER RELIEF next page 1st.

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EXHIBIT "B"

(750 ILCS 5/505) (from Ch. 40, par. 505)

Sec. 505. Child support; contempt; penalties.

In a proceeding for dissolution of marriage, legal separation, declaration of invalidity of marriage, or dissolution of a civil union, a proceeding for child support following a legal separation or dissolution of the marriage or civil union by a court that lacked personal jurisdiction over the absent spouse, a proceeding for modification of a previous order for child support under Section 510 of this Act, or any proceeding authorized under Section 501 or 601 of this Act, the court may order either or both parents owing a duty of support to a child of the marriage or civil union to pay an amount reasonable and necessary for support.

Exhibit "A" and Exhibit "B" in support of motion and affidavit, due to reason petitioner and respondent, was never married.

NOTARY:

State of Illinois

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County of Cook

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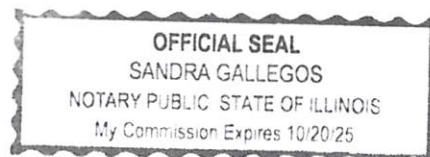
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 (Name of Document)

Lynn Hicks
 (Signer)

Notary Public

Sandra Gallegos
 Name:

1-10-2022



SEE EXHIBIT "A" & "B" Attached to Compt
 See EXHIBIT "B" PETITION TO SET TEMPORARY AND PERMANENT
 AFFIDAVIT CHILD SUPPORT AND FOR OTHER RELIEF next page 1 of 1

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EXHIBIT "A"

(750 ILCS 5/501) (from Ch. 40, par. 501)

Sec. 501. Temporary relief. In all proceedings under this Act, temporary relief shall be as follows:

(a) Either party may petition or move for:

(1) temporary maintenance or temporary support of a child of the marriage entitled to support, accompanied by an affidavit as to the factual basis for the relief requested one form of financial affidavit, as determined by the Supreme Court, shall be used statewide the financial affidavit shall be supported by documentary evidence including, but not limited to, income tax returns, pay stubs, and banking statements.

EXHIBIT "B"

(750 ILCS 5/505) (from Ch. 40, par. 505)

Sec. 505. Child support; contempt; penalties.

In a proceeding for dissolution of marriage, legal separation, declaration of invalidity of marriage, or dissolution of a civil union, a proceeding for child support following a legal separation or dissolution of the marriage or civil union by a court that lacked personal jurisdiction over the absent spouse, a proceeding for modification of a previous order for child support under Section 510 of this Act, or any proceeding authorized under Section 501 or 601 of this Act, the court may order either or both parents owing a duty of support to a child of the marriage or civil union to pay an amount reasonable and necessary for support.

Exhibit "A" and Exhibit "B" in support of motion and affidavit, due to reason petitioner and respondent, was never married.

NOTARY:

State of Illinois

County of Cook

Subscribed and sworn before me on this 10th day of January in the year 2022 by

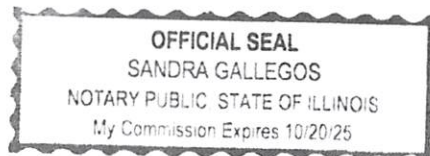
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(Signer)

Notary Public

Sandra Gallegos
 Name:

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X Lynn Hicks

SEE Exhibit "A" & "B" Attached to Compl
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EXHIBIT "A"

(750 ILCS 5/501) (from Ch. 40, par. 501)

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EXHIBIT "B"

(750 ILCS 5/505) (from Ch. 40, par. 505)

Sec. 505. Child support; contempt; penalties.

In a proceeding for dissolution of marriage, legal separation, declaration of invalidity of marriage, or dissolution of a civil union, a proceeding for child support following a legal separation or dissolution of the marriage or civil union by a court that lacked personal jurisdiction over the absent spouse, a proceeding for modification of a previous order for child support under Section 510 of this Act, or any proceeding authorized under Section 501 or 601 of this Act, the court may order either or both parents owing a duty of support to a child of the marriage or civil union to pay an amount reasonable and necessary for support.

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NOTARY:

State of Illinois

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County of Cook

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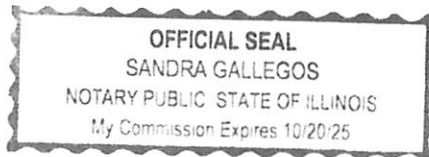
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Lynn Hicks
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Notary Public

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 Name:

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SEE EXHIBIT "A" & "B" Attached to Compt
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 CHILD SUPPORT AND FOR OTHER RELIEF next page 1 of 1

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EXHIBIT "B"

(750 ILCS 5/505) (from Ch. 40, par. 505)

Sec. 505. Child support; contempt; penalties.

In a proceeding for dissolution of marriage, legal separation, declaration of invalidity of marriage, or dissolution of a civil union, a proceeding for child support following a legal separation or dissolution of the marriage or civil union by a court that lacked personal jurisdiction over the absent spouse, a proceeding for modification of a previous order for child support under Section 510 of this Act, or any proceeding authorized under Section 501 or 601 of this Act, the court may order either or both parents owing a duty of support to a child of the marriage or civil union to pay an amount reasonable and necessary for support.

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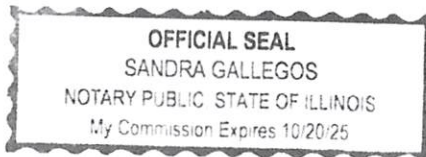
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